

UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

IN RE:

LEHMAN BROTHERS INC.,

Debtor.

Bankruptcy No. 08-01420 (JMP)  
SIPA

**UMWA 1974 PENSION TRUST'S RESPONSE  
TO TRUSTEE'S 204<sup>th</sup> OMNIBUS OBJECTION TO GENERAL CREDITOR CLAIMS  
AND REQUEST FOR TIME TO PRODUCE DOCUMENTATION**

The Trustees of the UMWA 1974 Pension Trust "Pension Trust", through counsel, respond to the Trustee's 204<sup>th</sup> Omnibus Objection to General Creditor Claims as follows:

1. Counsel is in receipt of the Notice of hearing on Trustee's 204<sup>th</sup> Omnibus Objection, and is in the process of obtaining the complete Objection.
2. One of the reasons stated for the proposed disallowance of the Pension Trust's \$720,000 claim is "duplicative of indenture trustee claim." The Pension Trust cautions that there may be confusion about this point and seeks time to resolve any confusion, noting that in 2013, another claim was expunged with the notation that it was "amended and superceded by surviving claim 5956," which is in fact this claim in question.  
  
Furthermore, counsel is not in possession of any indenture trustee claim, and seeks time to resolve the facts with the Trustee.
3. Another reason stated in the Trustee's objection for the proposed disallowance is that "claim lacks sufficient documentation." Counsel seeks time to obtain and produce for the Trustee any relevant documentation.

WHEREUPON, the Pension Trust opposes the disallowance and expungement of the claim and seeks additional time to resolve this matter with the Trustee.

Respectfully submitted,

/s/ Barbara E. Locklin

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BARBARA E. LOCKLIN  
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Dated: February 27, 2014

CERTIFICATE OF SERVICE

I hereby certify that on February 27, 2014, I served the foregoing UMWA 1974  
PENSION TRUST'S RESPONSE TO TRUSTEE'S 204<sup>TH</sup> OMNIBUS OBJECTION TO  
GENERAL CREDITOR CLAIMS AND REQUEST FOR ADDITIONAL TIME TO PRODUCE  
DOCUMENTATION upon the following individuals by express mail / next morning delivery:

Chambers of Hon. Shelley C. Chapman  
One Bowling Green, Courtroom 621  
New York, NY 10004

Hughes, Hubbard & Reed LLP  
One Battery Park Plaza  
New York, NY 10004  
Attn: Meaghan C. Gragg, Esq.

Levine Lee LLP  
666 Fifth Ave.  
New York, NY 1013  
Attn. Miriam L. Alinikoff, Esq.

Securities Investor Protection Corp.  
805 Fifteenth Street, NW  
Washington, DC 20005  
Attn: Kenneth J. Caputo, Esq. Ste 800

and

Weil Gotshal & Manges LLP  
767 Fifth Ave.  
New York, NY 10153  
Attn: Maurice Horwitz, Lori R. Fife, Esqs.

/s/ Barbara E. Locklin

Barbara E. Locklin  
Assistant General Counsel